

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 02-CR-73A

MARK CONGI, JOEL CICERO, et al.

Defendants.

**DEFENDANT JOEL CICERO'S
PROPOSED *VOIR DIRE* QUESTIONS**

Respectfully submitted,

By 

JOSEPH M. LETONA, ESQ.

Attorney for Defendant,
JOEL CICERO
Office and Post Office Address
716 Brisbane Building
403 Main Street
Buffalo, New York 14203
(716) 842-0416

- 1 Have you, a family member or a close friend had a business or other relationship with any of the following:**

**Niagara Falls Bridge Commission
World Duty Free or Duty Free America
ProServe, Inc.
Laborers Local 91
United States Customs
Kulback Construction Company
Niagara County District Attorney's Office
Niagara County Sheriff's Department
New York State Police
Niagara Falls Reporter**

If yes, identify the individuals and entities involved in the relationship and state the nature of the relationship.

Is the relationship still in existence and, if not, how did it end?

What was your opinion, relative's opinion or your close friend's opinion of the entity and/or individual entity member with whom the relationship existed.

- 2. Have you, a family member or close friend ever had a dispute with or was involved in litigation involving any of the following:**

**Niagara Falls Bridge Commission
World Duty Free or Duty Free America
ProServe, Inc.
Laborers Local 91
United States Customs
Kulback Construction Company
Niagara County District Attorney's Office
Niagara County Sheriff's Department
New York State Police
Niagara Falls Reporter**

If yes, describe the nature of the dispute and who specifically was involved in the dispute.

Has the dispute been resolved and, if so, how was it resolved?

- 3. Do you, your family or any close friends drive to and from Canada?**

Is any particular bridge used for such travel and, if so, which one?

What has been the biggest problem or inconvenience experienced by you, your family or a close friend in traveling to or from Canada by automobile?

4. Have you, your family or a close friend noticed any difference since September 11, 2001 in traveling to and from Canada by car?
5. Have you, your family or a close friend ever shopped at the Duty Free store while proceeding to or from Canada?
6. Have you, your family or a close friend ever stopped to eat on, at or near the bridge to Canada?
7. Have you, a family member or close friend been involved in the construction industry?

If so, was the involvement with labor or with management? And please specify the nature of the involvement and any positions held.

If involvement was with labor, were you, a family member or close friend a member of a union or not? And if so, which union?

Did the involvement in the construction industry ever include any disputes?

If so, specify the nature of the dispute and how the dispute was resolved.

Regarding any dispute, was any outside third-party intervention needed and, if so, by whom?

8. What is your opinion of the construction industry?
9. What is your opinion of construction unions?

DATED: June 15, 2006
Buffalo, New York

Respectfully submitted,



JOSEPH M. LaTONA

Attorney for Defendant,
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CERTIFICATE OF SERVICE

IT IS HEREBY certified that the foregoing document was filed on a CD-Rom in .PDF format, via hand delivery, with the following:

**CLERK OF THE COURT
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**
68 Court Street
Buffalo, New York 14202

IT IS HEREBY further certified that a true copy of the foregoing document was served, via hand delivery, upon the following:

WILLIAM J. HOCHUL, JR., ESQ.
Assistant United States Attorney
138 Delaware Avenue
Buffalo, New York 14202

this 21st day of June, 2006.



SANDRA LEE WRIGHT